
OAR Box 1214

Prepped by Ollie Stewart

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**Sergeant****Oil & Gas Co., Inc.**

P.O. Box 812, Houston, Texas 77001 • 333 West Loop North 713/688-8200

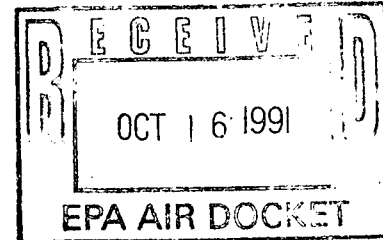
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October 7, 1991

Environmental Protection Agency
Air Docket (LE-131)
401 M Street, SW
Washington, D.C. 20460

Subject: Application of Ethyl Corporation
pursuant to Section 211 (f) of
The Clean Air Act for a waiver
for the manganese-based gasoline
additive.



Gentlemen:

Sergeant Oil & Gas Co., Inc. has sold components of gasoline since its inception in 1976. During the late 1970's and early 1980's, Sergeant was one of the first blenders of leaded gasoline. Recently Sergeant has been unable to blend unleaded gasoline for lack of affordable high octane components. Sergeant believes its ability to produce unleaded gasoline would be enhanced with the approval of the subject request.

There appears to be a large body of evidence to indicate that neither the environment nor automobile catalytic converter would be damaged with the addition of low levels of manganese to motor gasoline. It is without contest that more gasoline could be produced from each barrel of crude with the addition of manganese additives. Each barrel less of crude oil that is imported to the USA improves our trade balance. Thus, the lack of harm to the environment, the reduction in import costs for foreign crude oil, and the improved efficiency of the U.S. refineries all imply that the subject request for waiver be approved.

Therefore, Sergeant favors the approval of the Ethyl waiver submission.

Sincerely,

J. B. Durrett

JBD:jo

cc: Mr. Hank Godbey
Mr. David C. Wilson